

UNITED STATES DISTRICT COURT
FOURTH DIVISION
DISTRICT OF MINNESOTA

Walter Arias,

Civil File No. _____

Plaintiff,

vs

NOTICE FOR REMOVAL

FedEx Freight, Inc.

Defendant.

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA:

Petitioner\Defendant FedEx Freight, Inc., respectfully shows and alleges the following in support of its Petition for Removal.

1. Petitioner is the Defendant in an action commenced against them in Ramsey County District Court entitled Walter Arias v. FedEx Freight, Inc. A true and correct copy of the Summons and Complaint served upon Petitioner is attached as Exhibit "A". No further proceedings have taken place in the state action.

2. Plaintiff, Walter Arias, is and was at all relevant times a citizen of the City of Cutler Bay, State of Florida. Petitioner\Defendant FedEx Freight, Inc. is and at all relevant times a corporation with its principal place of business in the State of Arkansas.

3. Complete diversity exists among the parties to this action and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. Based upon the foregoing, this Court has original jurisdiction for this matter pursuant to 28 U.S.C. § 1332, and the entire matter is one which may be removed to this Court pursuant to 28 U.S.C. § 1441.

5. The Summons and Complaint in the state action was served on FedEx Freight, Inc. on or about July 16, 2021, and Petitioner\Defendant have filed this Notice to Remove within thirty (30) days after service of the Summons and Complaint.

WHEREFORE, Petitioner\Defendant FedEx Freight, Inc. prays that the state action pending against them be removed to this Court.

Dated: July 27, 2021

Lind, Jensen, Sullivan & Peterson
A Professional Association

/s/ Brian A. Wood

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